

FILED

JAN 24 2022

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY *[Signature]* DEP. CLK.

UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA  
VS  
MONICA RENTERIA-GONZALEZ

7:12-CR-0037-FA-11

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PETITIONER'S 18 USC 3582(c)(1)(A)(I) LEAVE TO SUPPLEMENT PENDING FSA SEC 603(b)(1) MOTION

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COMES NOW petitioner Monica Renteria-Gonzalez, acting in propria persona with her Leave to Supplement her pending Sec 3582(c)(1)(A)(ii) as submitted pursuant to USSG 1B1.13(C) (caregiver situation) to amend as 'other' reasons and material facts in support thereof of reduction in sentence RIS amalgamated on original grounds.

SUPPLEMENT GROUNDS

The original grounds are associated with USSG 1B1.13(C) caregiver deteriorating health that Covid -19 related family issued during the pandemic. The post-Covid-19 side effects have taken a toll on petitioner's mother and caregiver of her three teenage children and work related issues. The deadly virus left petitioner's mother with some serious side effects hindering her job performance and ability to wholly care for the household and children under her supervision. This ground has been wholly audited by CJA appointed counsel but abandoned per her withdrawal.

The alternative grounds sought to supplement are "other reasons" associated with 1), that petitioner has served "the lion's share" of her sentence and subject to deportation by an immigration court is determined ineligible to remain upon release and did not received a -1 level variance during sentencing. 2), in support of her petition for for compassionate release, petitioner wish to supplement with available Character Letters in support from family members to demonstrate support and her constant contact during incarceration with mother and children for moral support and encourage her children to pursue higher education. The children letters will show both of teenage children Lenny and Ruby have excelled in high school and obtained advance grades and early college placement based on grades and efforts by the children. Petitioner's mother is to be thanked for such progresses. Third; 3), petitioner PATTERN recidivism score is low moderate and rehabilitation efforts excellent with job detail performance and recommendations highly evaluated by direct supervisor during the Covid-19 modified operations throughout the pandemic. Petitioner's training and vocational skills ranges are considered multitasks and ready to function as law abiding citizen upon release with 'lesson learned' optimistic approach.

Lastly and worth consideration is petitioner's immigration limbo upon release. Although informed in court of the consequences of removal, yet petitioner did not receive a -1 level variance under the Guidelines based on said issue and now seeks such consideration amalgamated with first ground.. Per the immigration detainer petitioner has forfeited the opportunity for early placement in community programs such as half-way house and RDAP credits nor FSA program credits available [upon approval] to U.S. citizens under similar circumstances. Petitioner has to serve the her in custody sentence completely and surrender to INS/ICE for removal proceedings; likely not to benefit from any of the early credits even if successful in her removal proceedings. The need to assist her mother with her own children plays an important role in her compassionate release or reduction in sentence to time served.

#### RELEVANT LAWS IN SUPPORT

The First Step Act-2018 does gives sentencing court's discretion to consider as here caregiver situations under Sec 1B1.13(C) and 'another' independent reasons such as listed, supra., to consider along with original ground. Petitioner has served 'the lion's share' of the original sentence imposed and has obtained academic achievements along with vocational training and low level recidivism and has a coherent release plan if release in the U.S. or removed to Mexico. Petitioner promise if released early or subsequently removed to remain in her designated country and function as an asset as oppose to a burden on society. For the most part petitioner has learned her lessons and the heartache of being removed from her beloved children and missed all of the family activities associated with the growing of her children and their education and festivities.

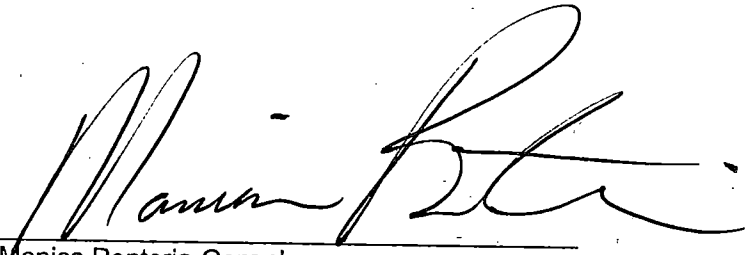
Thus, multiple factors play a role in the consideration of FSA Sec 603(b) compassion for early release or her reduction of sentence to time served based on the 'lion's share' of the sentence served. Petitioner prays for such privileges and full consideration of the documents provided and facts in support thereof.

#### CONCLUSION AND PRAYER

Leave to supplement with character letters and material facts is timely and appropriate and elaboration is warranted upon review. Petitioner herewith prays for full consideration and compassionate release or reduction in sentence RIS to time served. Petitioner prays for any other relief deem just and proper under similar case by case basis and circumstances including the Sec 3553(a) sentencing factors. Petitioner prays for immediate release or time served relief.

#### CERTIFICATE OF SERVICE

Petitioner Monica Renteria Gonzalez declares to have served the AUSA office with a hard copy and further declares to have placed the foregoing on the hands of prison officials for delivery. The foregoing with first class postage prepaid and deposited therein. 28 USC 1746.



Monica Renteria-Gonzalez, pro se